

EXHIBIT 13

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

MARK SNOOKAL, an individual,)
)
Plaintiff,)
)
v.) NO. 2:23-cv-6302-
) HDV-AJR
CHEVRON USA, INC., a California)
Corporation, and DOES 1 through)
10, inclusive,)
)
Defendants.)
_____)

Videotaped deposition of MARK JORDAN

SNOOKAL, Plaintiff, taken on behalf of Defendants

at 333 South Hope Street, 43rd Floor, Los Angeles,

California, commencing at 10:00 a.m. on Friday,

May 10, 2024, before John M. Taxter, Certified

Shorthand Reporter No. 3579 in and for the State

of California, a Registered Professional Reporter.

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21 VIDEOGRAPHER:

22 GIGI FADICH
23
24
25

1	time whose name escapes me at the moment to	10:25:05
2	basically put me back in analyzer engineering but	10:25:09
3	with a focus on analyzer reliability improvement.	10:25:13
4	So they kind of made that one up.	10:25:19
5	Q They created a position for you because	10:25:23
6	they wanted you in that -- in that department?	10:25:25
7	A Correct.	10:25:27
8	Q And I -- I guess my question had been	10:25:28
9	you -- you said it wasn't a promotion.	10:25:30
10	Was it a lateral move? And was it -- it	10:25:32
11	wasn't a demotion; right?	10:25:34
12	A In my mind, it was a demotion. It was a	10:25:37
13	lateral move from a career development standpoint,	10:25:40
14	I was told.	10:25:48
15	Q And why --	10:25:48
16	A And I treated it that way, but it didn't	10:25:49
17	really feel like that at the time.	10:25:53
18	Q Why was it a demotion, in your mind?	10:25:54
19	A I went from supervising a group of 18	10:25:57
20	people to supervising no one and essentially doing	10:25:59
21	the same job that I left before I did that	10:26:03
22	supervisory job.	10:26:05
23	Q Were you paid the same?	10:26:09
24	A I was.	10:26:10
25	Q And that -- so that position is in the	10:26:13

1	subgroup.	10:28:03
2	Is that right?	10:28:03
3	A That is correct.	10:28:04
4	Q Then so at this point you had worked in	10:28:06
5	the maintenance department and in the engineering	10:28:08
6	group; is that right?	10:28:12
7	A Yes.	10:28:13
8	Q And you held that IEAR team lead	10:28:16
9	position from November of 2016 to November of	10:28:19
10	2019; is that right?	10:28:22
11	A Yes.	10:28:22
12	Q Okay. And did I already ask you this?	10:28:26
13	You were a PSG 22 in that position?	10:28:28
14	A I was.	10:28:32
15	Q And then I think that was around the	10:28:34
16	time of the Escravos which we'll get into in a	10:28:38
17	moment.	10:28:43
18	Is that right?	10:28:43
19	A Yes, it was.	10:28:43
20	Q Okay. Now, you -- you were based out of	10:28:44
21	Chevron's El Segundo refinery throughout your time	10:28:47
22	with Chevron; correct?	10:28:50
23	A That's correct.	10:28:51
24	Q And your employer was Chevron USA, Inc.;	10:28:53
25	is that right?	10:28:53

1	A	They have a very complicated corporate	10:28:59
2		structure, so I don't actually know --	10:29:01
3	Q	Okay.	10:29:01
4	A	-- the answer that question.	10:29:04
5	Q	As you sit here right now, do you have	10:29:06
6		any reason to dispute that your employer	10:29:07
7		throughout that time was Chevron USA, Inc.?	10:29:10
8	A	I do not.	10:29:12
9	Q	And how many employees total at the	10:29:14
10		El Segundo refinery, your best estimate?	10:29:15
11	A	I would say around a thousand.	10:29:18
12	Q	And there were -- so I -- correct me if	10:29:21
13		I'm wrong, but I -- as I understand it, there --	10:29:26
14		and I think we talked about this a little bit.	10:29:30
15		There are different departments, and in	10:29:33
16		the maintenance department there are four	10:29:34
17		subgroups -- right? -- or at the time there were	10:29:36
18		four subgroups; routine maintenance, reliability,	10:29:38
19		integrity, integrity turnaround, and construction	10:29:43
20		services.	10:29:46
21		Does that sound right?	10:29:47
22	A	You'll have to break them up a little	10:29:48
23		bit more.	10:29:50
24	Q	Okay.	10:29:50
25	A	Not -- not further, just a little more	10:29:50

1 page 3 of the document, SNOOKAL-607, is that your 10:46:02
2 signature at the bottom? 10:46:07
3 A It is. 10:46:08
4 Q And it's dated July 18, 2019; is that 10:46:08
5 right? 10:46:08
6 A That's correct. 10:46:13
7 Q And is this referred to as an MSEA form? 10:46:16
8 A It is. 10:46:19
9 Q And so on -- and so on the first three 10:46:24
10 pages of the form up to your signature, all the 10:46:28
11 boxes that are checked, you checked those; right? 10:46:33
12 A That's correct. 10:46:36
13 Q Okay. And so box No. 1 is: 10:46:36
14 "Do you have any medical, 10:46:40
15 physical or psychological 10:46:41
16 conditions under the care of a 10:46:42
17 health professional? If yes, 10:46:44
18 please describe." 10:46:46
19 You marked by the box "yes"; right? 10:46:48
20 A Correct. 10:46:48
21 Q And then you said: 10:46:50
22 "I have a dilated aortic root. 10:46:51
23 I am under the care of a 10:46:54
24 cardiologist and see him once per 10:46:56
25 year for a checkup. I have 10:46:58

1 consulted with him on this 10:46:59
2 assignment, and he sees no issues 10:47:00
3 with it." 10:47:02
4 You wrote that; correct? 10:47:02
5 A I did. 10:47:03
6 Q And you -- you had -- you had testified 10:47:05
7 about this earlier. I'm sorry for -- for -- I 10:47:09
8 think you were diagnosed with the dilated aortic 10:47:12
9 root in 2015. 10:47:16
10 Is that wrong? 10:47:17
11 A I -- I honestly can't remember if it was 10:47:19
12 late 2014 or 2015. 10:47:21
13 Q Okay. But in that time frame? 10:47:24
14 A In that time frame. 10:47:26
15 Q And who -- who diagnosed you with that? 10:47:27
16 A Dr. Khan who was my doctor through this 10:47:30
17 whole event. 10:47:34
18 Q Is he with Cedars? 10:47:36
19 A He, I think, has multiple affiliations. 10:47:40
20 I saw him at Kaiser Permanente, Los Angeles. 10:47:44
21 Q And, I mean, I -- I just want to ask a 10:47:49
22 couple background questions about it. I don't 10:47:54
23 want to get too far into your -- your medical 10:47:55
24 history. 10:48:00
25 What -- when -- when he diagnosed you 10:48:00

1 with it, what was the prognosis? 10:48:02

2 A To sum it up, he said that sometimes the 10:48:09

3 aortic root will not expand any more than it 10:48:15

4 already has and it will never expand to a point 10:48:18

5 where they consider it to be something that they 10:48:23

6 should operate on, or it can expand at a rate and 10:48:26

7 to a size that they consider to be operable or 10:48:36

8 something that they should operate on. He said 10:48:40

9 that there's no way to accurately predict -- 10:48:44

10 predict which one mine would be but that the rate 10:48:51

11 of growth determines how they treat it, basically. 10:48:54

12 Q Okay. And -- and I think here you say 10:49:04

13 that you had to see him on a yearly basis. Was 10:49:08

14 that what he -- what he -- 10:49:11

15 A They call it -- 10:49:13

16 Q -- said at the time? 10:49:14

17 A Yes. They call it "watchful waiting" 10:49:16

18 which is basically taking a picture of it once a 10:49:19

19 year and seeing if it's grown or not and at what 10:49:22

20 rate from the last time. 10:49:25

21 Q And so you -- you followed up on a 10:49:26

22 yearly basis with him, I'm assuming? 10:49:28

23 A Every year. 10:49:30

24 Q And how did it develop, if at all? 10:49:31

25 A There were some years where it grew at a 10:49:36

1 low rate and other years where it had remained 10:49:40
2 stable. I believe at the time that I applied it 10:49:44
3 had been stable for two or three years. 10:49:47
4 Q And you may have already said this, but 10:49:53
5 the cardiologist that you're referring to here on 10:49:56
6 page 1 of -- of this exhibit, Exhibit 3, is 10:49:58
7 Dr. Khan; right? 10:50:02
8 A Yes. That's correct. 10:50:03
9 Q What's the current state of the 10:50:08
10 condition? 10:50:10
11 A I'm not sure how to answer that 10:50:13
12 question. 10:50:15
13 Q Have you continued to see Dr. Khan about 10:50:17
14 the dilated aortic root? 10:50:19
15 A Dr. Khan retired. He retired during 10:50:22
16 COVID. Kaiser had trouble assigning me a new 10:50:25
17 doctor, and during that time I left Chevron. 10:50:30
18 After this I went to Portland, and I continued my 10:50:37
19 care in Portland. 10:50:43
20 Q Okay. With a different cardiologist, I 10:50:44
21 assume? 10:50:47
22 A With a different -- yeah. 10:50:47
23 Q And what is his or her name? 10:50:48
24 A I've actually -- the first two years I 10:50:49
25 was in Portland they did not assign me a 10:50:53

1 cardiologist. They just managed it through my 10:50:55
2 primary-care physician. I recently changed 10:50:58
3 employment to a different employer, and I do have 10:51:02
4 a cardiologist now, a Dr. Schneider. I've only 10:51:05
5 seen him once. 10:51:10

6 Q Okay. And we'll get into this more 10:51:11
7 later, but I believe you moved to Washington? 10:51:13

8 A Correct. 10:51:14

9 Q And so Dr. Schneider is in Washington? 10:51:15

10 A He's actually in Portland. I live right 10:51:17
11 near Portland, Oregon. 10:51:21

12 Q Oh, I see. 10:51:21

13 A There's a heart center in Portland, 10:51:22
14 Oregon. 10:51:26

15 Q And when was your most recent checkup 10:51:26
16 with Dr. Schneider? 10:51:28

17 A It was actually unrelated to the aortic 10:51:31
18 root dilation and was in -- I don't remember the 10:51:36
19 exact month, but it was late 2023. 10:51:43

20 Q And what was it related to? 10:51:46

21 A Tangentially related to PVCs that I also 10:51:50
22 listed on the form. They ablated those to end -- 10:51:56
23 end me having PVCs. 10:51:59

24 Q What are PVCs? 10:52:01

25 A Premature ventricular contractions. 10:52:03

1 BY MR. MUSSIG: 10:59:00

2 Q Well, I -- you know, let me -- let me 10:59:03

3 rephrase it. 10:59:04

4 The document speaks for itself, but did 10:59:05

5 Dr. -- did Dr. Sobel tell you at any point that 10:59:08

6 getting the recommendation letter would guarantee 10:59:10

7 medical clearance? 10:59:12

8 A What Dr. Sobel said when he gave this to 10:59:14

9 me was -- he said, "You'll just need a letter from 10:59:16

10 your cardiologist. This is what it should say, 10:59:19

11 and then it should be fine." 10:59:22

12 Q Okay. Did he say anything about needing 10:59:27

13 further assessment? 10:59:33

14 A He did not. 10:59:35

15 Q Since this visit, have you ever seen 10:59:40

16 Dr. Sobel again? 10:59:42

17 A No. He's not my doctor, so -- 10:59:42

18 Q I understand. It was just this one 10:59:47

19 time? 10:59:49

20 A Yeah. 10:59:51

21 MR. MUSSIG: I'll mark as Exhibit 4. 10:59:55

22 It's a letter from Dr. Khan on Kaiser Permanente 11:00:00

23 letterhead. It's Bates-numbered SNOOKAL-665. 11:00:05

24 (Exhibit 4 was marked for identification 11:00:05

25 by the Certified Shorthand Reporter.) 11:00:18

1 A This e-mail was sent after I requested 11:48:12
2 this e-mail, so there was no response necessary. 11:48:14
3 Q How did you request the e-mail? 11:48:18
4 A Through Andrew Powers which was the HR 11:48:20
5 manager at El Segundo. 11:48:23
6 Q And why did you request the e-mail? 11:48:25
7 A Because I wanted them to give me written 11:48:28
8 documentation of why they were saying that I 11:48:29
9 couldn't go to Escravos and to identify other 11:48:32
10 locations where they would consider me to be 11:48:35
11 medically fit. 11:48:38
12 Q Oh. And he does that in this e-mail -- 11:48:40
13 right? -- at the -- at the bottom? 11:48:42
14 A Correct. 11:48:43
15 Q Did you ever apply to any jobs in those 11:48:44
16 locations? 11:48:47
17 A There were no job openings in those 11:48:48
18 locations. 11:48:49
19 Q I see. And I -- I guess most -- are 11:48:49
20 these locations -- well, I -- I don't know if 11:49:04
21 you -- you probably don't know, but I'll ask the 11:49:10
22 question. You can say "I don't know." 11:49:13
23 Would they have adequate medical 11:49:14
24 facilities in all these locations where he 11:49:15
25 indicates he would not foresee any issues with you 11:49:17

1 of discrimination to anyone else at Chevron? 11:55:59

2 A No. 11:56:02

3 Q And when you say "based on a lack of 11:56:03

4 understanding," what -- what do you mean by that? 11:56:13

5 A In my opinion, I don't believe that the 11:56:18

6 people that evaluated me did their due diligence 11:56:21

7 in understanding the condition that I had and the 11:56:24

8 effects that a remote location would have. That's 11:56:28

9 what I meant by that. 11:56:30

10 Q Okay. And why do you believe that? 11:56:31

11 A Just based on the conversations that I 11:56:35

12 had with them, it was clear that they didn't 11:56:36

13 really know what they were looking at and the fact 11:56:38

14 that they took a 17-year-old study as the only 11:56:41

15 piece of evidence that they looked at, as far as I 11:56:47

16 knew. 11:56:50

17 Q Wasn't the 17-year-old study referenced 11:56:53

18 by Dr. Khan? 11:56:55

19 A It's not Dr. Khan's job to give them the 11:56:57

20 information that they need. They didn't -- 11:57:01

21 Q So you agree that they were -- they 11:57:05

22 based their decision on the information provided 11:57:07

23 by Dr. Khan; right? 11:57:09

24 MS. LEAL: Objection. Calls for 11:57:10

25 speculation. 11:57:11

1 dated September 5th, 2019 -- well, an e-mail from 12:12:12
2 Mr. Snookal but to Austin Ruppert and then from 12:12:15
3 Mr. Ruppert to Troy Tortorich, Thalia Tse, and 12:12:19
4 Andrew Powers. 12:12:24
5 (Exhibit 10 was marked for 12:12:24
6 identification by the Certified 12:12:24
7 Shorthand Reporter.) 12:12:24
8 BY MR. MUSSIG: 12:12:24
9 Q Do recognize the first e-mail in this 12:12:45
10 chain, the one at the bottom of the page? 12:12:47
11 A Yes. 12:12:47
12 Q Okay. And this is an e-mail from you to 12:12:53
13 Mr. Ruppert; correct? 12:12:55
14 A Correct. 12:12:56
15 Q And Mr. Ruppert at this point was your 12:12:57
16 supervisor; right? 12:12:59
17 A Correct. 12:13:00
18 Q And it says "position" -- the "subject" 12:13:01
19 line is "positions in 2H PDC." 12:13:03
20 What does -- what does the "2H PDC" 12:13:06
21 mean? 12:13:09
22 A A second half PDC. I don't know what 12:13:10
23 the acronym stands for. It's just what they used 12:13:14
24 for the job selection process at Chevron. 12:13:17
25 Q Okay. And so why -- they look -- you're 12:13:24

1	e-mailing Mr. Ruppert three possible positions.	12:13:30
2	Why were you doing that?	12:13:33
3	A They asked me to search and see which	12:13:34
4	positions in El Segundo I felt that I would be	12:13:36
5	qualified for.	12:13:40
6	Q And is that because this was after the	12:13:41
7	Escravos -- the REM position in Escravos had been	12:13:45
8	rescinded and your IEAR team lead position had	12:13:50
9	been back-filled?	12:13:55
10	A That's correct.	12:13:56
11	Q And I'm going to ask you a few	12:13:57
12	questions. You may or may not know the answer,	12:14:07
13	but I just want to see if you do.	12:14:10
14	Any -- any job postings in the PDC	12:14:12
15	require a specific application process; right?	12:14:16
16	A They do.	12:14:19
17	Q Okay. And each of those jobs has a -- a	12:14:20
18	PDR, a personal development representative,	12:14:23
19	assigned to the job?	12:14:25
20	A That's correct.	12:14:26
21	Q Okay. And a PDR can represent 15 to 20	12:14:27
22	jobs in the process; right?	12:14:31
23	A I don't know the numbers, but --	12:14:34
24	Q More than one?	12:14:36
25	A -- more than one.	12:14:36

1	Q	And each of those jobs also has a job	12:14:38
2		owner; is that right?	12:14:41
3	A	That's my understanding. Yes.	12:14:43
4	Q	Okay. And the job owner is typically	12:14:45
5		the hiring supervisor for the opening; is that	12:14:47
6		right?	12:14:47
7	A	I don't know if it's typically the -- I	12:14:50
8		don't know if it works that way.	12:14:52
9	Q	Okay. You just don't have any knowledge	12:14:53
10		one way or the other?	12:14:56
11	A	I don't.	12:14:58
12	Q	Do you know if the job owner is also	12:14:58
13		typically the supervisor who the employee would	12:15:02
14		report to, if they get that job?	12:15:04
15	A	I -- I do not know the answer to that.	12:15:06
16		No.	12:15:08
17	Q	Okay. Do you have any knowledge about	12:15:09
18		the job owner's role in the decision-making	12:15:14
19		process as to -- as to the particular job?	12:15:16
20	A	Not in a generic sense. Generally, each	12:15:20
21		job is defined -- they'll tell you who to talk to.	12:15:22
22		It's not, in my experience, always the same	12:15:27
23		person.	12:15:31
24	Q	What do you mean, "it's not"?	12:15:31
25	A	The -- the -- the owner of the position	12:15:32

1	is not always the person that will be your	12:15:35
2	supervisor --	12:15:38
3	Q I see.	12:15:39
4	A -- in my experience. That doesn't mean	12:15:39
5	I know the process.	12:15:43
6	Q Sure. In your experience, is it usually	12:15:44
7	the supervisor?	12:15:47
8	A No.	12:15:47
9	Q So more often than not the job owner is	12:15:54
10	not the same as the person that would be	12:15:56
11	supervising the position, in your experience?	12:15:58
12	A In my recollection and experience, that	12:16:01
13	is correct.	12:16:03
14	Q In -- in your recollection and	12:16:05
15	experience, do you know then like how a job owner	12:16:06
16	would be selected or assigned?	12:16:10
17	A I do not.	12:16:18
18	Q Earlier you had said -- going back to	12:16:25
19	the exhibit, Exhibit 10, you had said they told	12:16:27
20	you to look through the PDC openings.	12:16:30
21	When you said "they" -- is that right?	12:16:34
22	A Yes.	12:16:36
23	Q Okay. When you said "they," who do	12:16:37
24	you -- who were you referring to?	12:16:39
25	A We had a meeting between Austin	12:16:41

1	"Powers," Thalia Tse, and --	12:16:44
2	Q Austin Ruppert?	12:16:49
3	A Sorry. Yes. Austin Ruppert, Andrew	12:16:50
4	Powers, and Thalia Tse. I believe that was on the	12:16:53
5	6th or 7th of September.	12:17:04
6	Q Well, this e-mail is dated	12:17:04
7	September 5th --	12:17:07
8	A Okay.	12:17:07
9	Q -- so it couldn't have been the 6th or	12:17:09
10	7th.	12:17:11
11	A So it might have been the 4th then.	12:17:11
12	Q Okay. Sometime shortly before you sent	12:17:13
13	this?	12:17:15
14	A I don't remember the exact date, but,	12:17:15
15	yeah, it must be September 5th. It would be the	12:17:17
16	same day that we had the meeting.	12:17:19
17	Q So you had the meeting, and then you	12:17:24
18	immediately went to look for positions; right?	12:17:29
19	A Right. So there is a time limit; right?	12:17:31
20	The PDCs happen on a cycle -- that's why	12:17:35
21	it's called "2H" -- and there's deadlines. I	12:17:39
22	believe we were -- I believe the deadline was	12:17:43
23	Friday, so --	12:17:45
24	Q And this was on Thursday?	12:17:49
25	A Yeah, if I recall correctly.	12:17:50

1 Q Now, at -- at one point in this case 12:18:07
2 there is an allegation that during this meeting 12:18:08
3 they identified three positions that you were 12:18:10
4 qualified for; operating assistant, general team 12:18:13
5 lead, and maintenance change operating assistant. 12:18:16
6 Are those the same as these positions 12:18:18
7 that are in this e-mail? 12:18:25
8 A Two are the same; one is not. 12:18:25
9 Q Okay. And so -- so let me -- is that 12:18:28
10 accurate, that allegation that you -- they 12:18:31
11 identified three positions they thought you were 12:18:34
12 qualified for? 12:18:36
13 A Yes. 12:18:37
14 Q Okay. 12:18:37
15 A That would be after this e-mail. So 12:18:37
16 Austin came and talked to me with three positions. 12:18:40
17 Q Oh. Oh, okay. So this e-mail came 12:18:44
18 after a meeting with Austin, not a meeting -- 12:18:50
19 A No. This -- so in the time line we met 12:18:52
20 to discuss the path forward with Austin, Thalia, 12:19:00
21 and Andrew. During that meeting, they said they 12:19:07
22 would look for positions, and they also asked me 12:19:12
23 to look for positions. So we both looked for 12:19:14
24 positions. 12:19:17
25 I sent them this e-mail with the 12:19:18

1	positions that I found. I don't know how they	12:19:20
2	came up with their positions that they approached	12:19:26
3	me with afterwards, but the positions that Austin	12:19:29
4	came and talked to me about were the second ones	12:19:34
5	on this e-mail, the two that start with "DS&C" --	12:19:39
6	Q Okay?	12:19:45
7	A -- which are positions in El Segundo.	12:19:45
8	And he came to me with a third position also in	12:19:47
9	El Segundo that isn't on this e-mail but is the	12:19:51
10	maintenance change OA.	12:19:55
11	Q Maintenance change "AOA"?	12:19:58
12	A Maintenance change OA.	12:20:00
13	Q Maintenance change?	12:20:03
14	A Yeah.	12:20:04
15	Q And why isn't that position on this	12:20:06
16	e-mail?	12:20:09
17	A I didn't particularly want that	12:20:11
18	position, so I didn't identify it.	12:20:13
19	Q Why didn't you want that position?	12:20:18
20	A It was a new position that had been	12:20:25
21	created that year, and I didn't see it having much	12:20:27
22	potential for career development and I saw it as a	12:20:33
23	possible step back in my career based on its job	12:20:45
24	description that I saw.	12:20:49
25	Q What in the job description made you	12:20:49

1 think that? 12:20:53

2 A No direct reports, a purely influential 12:20:53

3 leadership position which can be a career 12:20:58

4 development position, but not if it doesn't have 12:21:01

5 an established pathway already. 12:21:04

6 Q And you said that position was created 12:21:06

7 earlier in the year? 12:21:09

8 A I -- I believe it was created for this 12:21:10

9 PDC. I don't think it existed before this PDC. 12:21:13

10 Q So -- so nobody had held that position 12:21:17

11 previously; right? 12:21:21

12 A It had existed once before, but it had a 12:21:22

13 different reporting structure which would have 12:21:25

14 been beneficial to your career. It reported 12:21:28

15 directly to the maintenance manager. And the new 12:21:31

16 position the second time they did it reported to a 12:21:35

17 different manager -- 12:21:38

18 Q And how long -- 12:21:39

19 A -- lower in the structure. 12:21:40

20 Q How long prior to this was that first 12:21:42

21 iteration of the position? 12:21:46

22 A You mean, when did it exist or when -- 12:21:51

23 Q Yes. 12:21:53

24 A It, I believe, was two years earlier, 12:21:54

25 and it was only held by one person, I believe, and 12:21:56

1 then discontinued -- 12:22:00

2 Q Okay. 12:22:01

3 A -- which also led into why I didn't want 12:22:05

4 it. 12:22:07

5 Q Okay. So looking at Exhibit 10, you 12:22:08

6 identify three positions. The first one you're -- 12:22:12

7 you're telling Austin that, according to 12:22:15

8 Dr. Levy -- I'm assuming you're saying in the 12:22:18

9 e-mail that we had looked at earlier -- 12:22:21

10 A Uh-huh. 12:22:23

11 Q -- you would not be -- you would not 12:22:24

12 qualify for that position? 12:22:25

13 A Correct. 12:22:26

14 Q Okay. And then the third one on your 12:22:27

15 list, it says a degree is "required for OA 12:22:28

16 positions, and I do not have a degree." 12:22:33

17 So did you think you were qualified for 12:22:35

18 that position? 12:22:36

19 A Yes, I do think I'm qualified for that 12:22:37

20 position. 12:22:42

21 Q Isn't a qualification -- and by "degree" 12:22:43

22 I assume you mean a college degree? 12:22:45

23 A College degree, correct. 12:22:47

24 Q And if it says a college degree is 12:22:48

25 required but you don't have one, how would you be 12:22:51

1 qualified? 12:22:53

2 A The operating assistant role is posted 12:22:54

3 many times each year, and it's for the same job 12:22:57

4 responsibilities and duties. And sometimes it has 12:23:03

5 a degree requirement, and sometimes it does not 12:23:07

6 have a degree requirement. Austin said that I 12:23:09

7 should go talk to Tolly Graves who was the 12:23:12

8 operations manager and the owner of that position 12:23:16

9 and ask him if I could apply, and he did give me 12:23:19

10 permission to apply without a college degree. 12:23:21

11 Q Do you think your lack of college degree 12:23:24

12 held you back at Chevron? 12:23:26

13 A Yes. 12:23:26

14 Q Do you agree that's not discriminatory? 12:23:32

15 A Yes. 12:23:34

16 Q So going back, I -- I -- I don't think 12:23:41

17 we finished with the time line. 12:23:43

18 So there was a meeting with you, Thalia, 12:23:46

19 Austin, and Andrew, and you said you left the 12:23:50

20 meeting saying, "Let's go see if there are other 12:23:54

21 jobs"; right? 12:23:57

22 A Uh-huh. 12:23:57

23 Q And so you went and you saw these three, 12:23:58

24 you sent them to Austin, and then I -- and I think 12:24:00

25 that's where we left off. 12:24:06

1	Q	Okay. Now, some of these jobs, looking	12:26:30
2		at the PSG which we talked about earlier, there --	12:26:33
3		there -- they range from PSG 21 to PSG 24; right?	12:26:36
4	A	Yes.	12:26:40
5	Q	And you were a PSG 22 at the time?	12:26:40
6	A	I was.	12:26:43
7	Q	Okay. And so were you looking for a PSG	12:26:44
8		22 position or a PSG 23 position?	12:26:49
9	A	I was looking at a position comparable	12:26:52
10		to the EGTL position which is a 23, 24 position.	12:26:55
11	Q	When you say "EGTL," that's the REM	12:27:00
12		position in Escravos?	12:27:04
13	A	Yes.	12:27:05
14	Q	Was a 23, 24 PSG?	12:27:05
15	A	It was.	12:27:08
16	Q	And how much would your pay have	12:27:08
17		increased going from PSG 22 to PSG 23?	12:27:12
18	A	Those aren't really published	12:27:19
19		information, so it would just be an estimate.	12:27:21
20	Q	What's your estimate?	12:27:24
21	A	Somewhere in the neighborhood of 12,000	12:27:26
22		"dollars" a year -- I'm sorry -- 12 percent a	12:27:28
23		year.	12:27:33
24	Q	And so how much were you making in the	12:27:35
25		22 position, PSG 22?	12:27:38

1	A	I think it was 147,000.	12:27:41
2	Q	Okay. So about another -- what? --	12:27:44
3		sixteen, seventeen thousand a year?	12:27:47
4	A	Roughly, plus there's an increase in	12:27:49
5		your bonus, your annual bonus, as well.	12:27:52
6	Q	And what is that increase?	12:27:54
7	A	Between 22 and 23 I think it goes from	12:27:56
8		14 to 16 percent, and 24 I believe is 18 percent.	12:28:00
9	Q	And how -- what would that translate to	12:28:06
10		in terms of dollars, again, estimates?	12:28:08
11	A	Two percent of my base pay. So what is	12:28:11
12		that?	12:28:14
13		Like 5,000, \$6,000 each grade.	12:28:15
14	Q	Okay. So what jobs did you ultimately	12:28:20
15		apply to in this September, October, November time	12:28:26
16		frame, 2019?	12:28:32
17	A	I applied to the maintenance general	12:28:33
18		team lead, the operating assistant, and the	12:28:35
19		maintenance change OA.	12:28:39
20	Q	Okay. Including -- so one of -- and	12:28:41
21		that's the OA -- the -- one of those OA positions	12:28:49
22		stated that it had a college degree requirement;	12:28:54
23		right?	12:28:54
24	A	Yes.	12:28:58
25	Q	Do you know -- and maybe you don't --	12:28:58

1 whether anyone -- when -- when a job has been 12:29:03
2 posted saying there's a college degree 12:29:08
3 requirement, somebody without a college degree has 12:29:10
4 ever gotten a job at El Segundo? 12:29:14
5 A I believe the answer is "yes," but I -- 12:29:16
6 yes. 12:29:18
7 Q And who do you know that did that? 12:29:19
8 A I believe Larry Laye applied for a job 12:29:23
9 as an OA when it required a college degree. 12:29:26
10 Q How do you spell his last name? 12:29:31
11 A L-a-y-e. 12:29:33
12 Q So you believe Larry Laye got an OA job 12:29:37
13 that had been posted as a -- as requiring a 12:29:40
14 college degree, even though he didn't have a 12:29:43
15 college degree? 12:29:45
16 A I believe so. 12:29:46
17 Q Anyone else? 12:29:47
18 A No. But lots of OAs have no college 12:29:48
19 degree and are OAs. And the OA position, like I 12:29:52
20 said, sometimes it's posted with a college degree, 12:29:56
21 sometimes posted without a college degree, and 12:30:00
22 people hold the same positions in the facility 12:30:02
23 with and without college degrees. 12:30:06
24 Q Well, you got the maintenance change OA 12:30:08
25 position; right? 12:30:10

1	A	I did not.	12:30:11
2	Q	Wait. What was the position? Oh. Hold	12:30:12
3		on. Hold on. Well, let me back up. Let's get	12:30:15
4		there.	12:30:17
5		Any other jobs that you applied to	12:30:19
6		between September and November, 2019?	12:30:21
7	A	Not that I recall.	12:30:23
8	MR. MUSSIG:	I don't know if you guys	12:30:38
9		want to do lunch.	12:30:39
10	MS. LEAL:	Well, we will need lunch.	12:30:40
11	MR. MUSSIG:	I -- this is probably as	12:30:42
12		good a time as any. Why don't we take a break.	12:30:44
13	THE VIDEOGRAPHER:	Video deposition off	12:30:46
14		the record at 12:30 p.m., conclusion of media 2.	12:30:48
15		(Lunch recess: 12:30 p.m.)	12:30:52
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

1	Los Angeles, California	12:30:52
2	Friday, May 10, 2024	12:30:52
3	1:34 p.m.	12:30:52
4		12:30:52
5	THE VIDEOGRAPHER: Video deposition	13:34:40
6	returning to the record at 1:34 p.m., beginning of	13:34:41
7	media 3.	13:34:45
8		13:34:45
9	FURTHER EXAMINATION	13:34:45
10	BY MR. MUSSIG:	13:34:45
11	Q One question I wanted to circle back on,	13:34:49
12	then we'll move on to -- to these documents.	13:34:51
13	Would you agree the decision to rescind	13:34:54
14	the REM job offer in Escravos was not based on	13:34:56
15	your ability or inability to do the job?	13:35:04
16	A Yeah. It didn't have anything to do	13:35:11
17	with my ability to do the job.	13:35:14
18	MR. MUSSIG: So let me mark as	13:35:16
19	Exhibit 11 a document that's titled "Job title:	13:35:18
20	Maintenance change operating assistant (OA),"	13:35:24
21	SNOOKAL-1131 to -1132.	13:35:27
22	(Exhibit 11 was marked for	13:35:27
23	identification by the Certified	13:35:27
24	Shorthand Reporter.)	13:35:27
25	BY MR. MUSSIG:	13:35:27

1 Q Now, I -- I assume you're familiar with 13:35:48
2 this document? 13:35:51
3 A Uh-huh. 13:35:51
4 Q You have to say "yes" or "no." 13:35:52
5 A Yes. I'm sorry. 13:35:54
6 Q So this is a -- a copy of the El Segundo 13:35:56
7 maintenance change operating assistant, OA, job 13:36:00
8 posting in the PDC database as of the time you 13:36:03
9 were searching for a job in or around September, 13:36:07
10 2019; right? 13:36:12
11 A Yes. 13:36:13
12 Q One question just sort of logistical: 13:36:13
13 So this says -- at the top it's -- it says: 13:36:18
14 "Chevron is accepting online 13:36:24
15 applications for the position of 13:36:26
16 maintenance change operating 13:36:27
17 assistant (OA) located in 13:36:28
18 El Segundo, California through 13:36:31
19 8/11/19." 13:36:34
20 Do you know -- I mean, you weren't 13:36:36
21 looking for a position as of 8/11/19. 13:36:38
22 Was -- was the job extended? Was this 13:36:41
23 deadline extended? 13:36:44
24 A It may have been. I'm not sure. 13:36:46
25 Q Okay. You don't recall? 13:36:47

1	position?	13:38:53
2	A I do not know that this position had a	13:38:54
3	PDR.	13:38:57
4	Q Do you know whether Mr. Cswaykus had any	13:39:07
5	knowledge regarding your heart condition?	13:39:14
6	A I would doubt it, but I don't know.	13:39:19
7	Q Do you know whether he knew your age?	13:39:23
8	A He did. I've worked with Cotey before.	13:39:25
9	Q Okay. And how did -- how would he know	13:39:27
10	your age?	13:39:30
11	A I mean, you can make an estimation. I	13:39:31
12	mean, I don't think he knew my age exactly, but	13:39:34
13	you can make an estimate of someone's age based on	13:39:36
14	appearance.	13:39:39
15	Q I see. So -- so you knew him, so you	13:39:40
16	assumed he had some estimate of how old you were?	13:39:43
17	A Correct.	13:39:45
18	Q On page 2 of this -- of this Exhibit 11	13:39:45
19	it has some "required qualifications" and some	13:40:03
20	"preferred qualifications."	13:40:07
21	Do you see that?	13:40:08
22	A I do.	13:40:09
23	Q And did you meet all the required	13:40:09
24	qualifications at the time you applied?	13:40:12
25	A Yes.	13:40:12

1 Q And did you meet all of the preferred 13:40:29
2 qualifications? 13:40:31
3 A No. 13:40:31
4 Q And I assume one of them was you didn't 13:40:37
5 have a Bachelor's degree; right? 13:40:40
6 A Correct. 13:40:42
7 Q Were there any other preferred 13:40:42
8 qualifications that you didn't meet? 13:40:44
9 And, again, this is at the time you 13:40:46
10 applied for the job. 13:40:48
11 A Uh-huh. For this particular job I would 13:40:48
12 say that it did not align with my career 13:41:00
13 development plan which is one of the preferred 13:41:03
14 qualifications. 13:41:08
15 Q I see. Any others? 13:41:08
16 A No. 13:41:08
17 Q Do you know who ultimately got this job? 13:41:12
18 A I can't remember their name. I -- I -- 13:41:21
19 I know loosely who they are, but I don't really 13:41:23
20 know them. 13:41:26
21 Q Okay. Do you think that you didn't get 13:41:26
22 this job for any sort of discriminatory reason? 13:41:28
23 A No. 13:41:31
24 MR. MUSSIG: Let's mark as Exhibit 12 a 13:41:44
25 document titled "Job title: DS&C - MFG - 13:41:48

1 various different positions; right? 13:44:03

2 So he's in operations, and I was in 13:44:06

3 engineering and maintenance. He was in his 13:44:08

4 various roles someone that I would work with on a 13:44:11

5 regular basis. 13:44:13

6 Q Do you -- do you know whether Mr. Byrd 13:44:20

7 would have any reason to have knowledge about your 13:44:22

8 heart condition? 13:44:26

9 A No. 13:44:26

10 Q You don't know or, "no," he would not? 13:44:29

11 A No, he would not. Sorry. 13:44:31

12 Q And, again, would he know your age, 13:44:33

13 other than just making a general estimate based 13:44:37

14 on, you know, the fact that he knew you? 13:44:39

15 A No, I wouldn't think so, other than 13:44:41

16 that. 13:44:44

17 Q Well, I mean, let me ask this: Did you 13:44:50

18 get this job? 13:44:52

19 A I did not. 13:44:53

20 Q And do you believe that decision was 13:44:53

21 discriminatory in any way? 13:44:55

22 A I believe it might have been, yes. 13:44:59

23 Q Okay. So let me ask a few more 13:45:01

24 questions. 13:45:04

25 Do you know who the decision maker was 13:45:06

1 them is a BS degree in engineering; right? 13:46:18

2 A Correct. 13:46:20

3 Q And you have didn't have a BS degree in 13:46:21

4 engineering; correct? 13:46:23

5 A That is correct. 13:46:24

6 Q And so now we -- we had talked earlier 13:46:26

7 about the fact that certain OA positions, 13:46:33

8 sometimes, when they were posted, they had a 13:46:37

9 college degree requirement; sometimes they didn't. 13:46:39

10 But if one of the required 13:46:45

11 qualifications is a BS degree in engineering and 13:46:47

12 you don't have that, why would you think you're 13:46:50

13 qualified for this job? 13:46:53

14 A I was told that it was a job that I 13:46:54

15 could apply for, if I got permission to apply for 13:46:57

16 it from Tolly Graves who was the operations 13:47:00

17 manager and would have been Zak Byrd's supervisor 13:47:07

18 or manager at that time. 13:47:16

19 Q Do you know who ultimately got this job? 13:47:16

20 A There's two jobs, and I remember the 13:47:19

21 name of one of them. I don't remember the name of 13:47:23

22 the other. One was Danielle Rivera. I don't 13:47:25

23 remember the name of the other. 13:47:36

24 Q Do you know whether Danielle Rivera had 13:47:38

25 a college degree? 13:47:42

1 these PMP ratings? 14:25:12

2 A It is one of the factors. 14:25:14

3 Q And do you know whether your PMP rating 14:25:15

4 was higher or lower than Brian Getchius' was? 14:25:18

5 A I believe it was lower for two of the 14:25:21

6 years. 14:25:23

7 Q And so you believe you were more 14:25:32

8 qualified than Brian Getchius for this position; 14:25:40

9 is that right? 14:25:40

10 A That is correct. 14:25:44

11 Q And why is that? 14:25:45

12 A Brian Getchius at this point had only 14:25:50

13 had supervisory experience of hourly or 14:25:52

14 represented employees. This GTL position is -- 14:25:55

15 your direct reports are salaried employees, and 14:26:02

16 then they have hourly reports to them. So it's an 14:26:05

17 indirect report relationship. I had had both 14:26:09

18 union employee representation -- or represented 14:26:15

19 employee supervision as well as at this point I 14:26:19

20 had had salaried representation -- salaried 14:26:25

21 employees' direct reports. 14:26:28

22 Q Okay. Any other reason you think you 14:26:31

23 were more qualified? 14:26:33

24 A I had a reliability background and a 14:26:35

25 better understanding of operations and maintenance 14:26:37

1 coordination and what jobs were important, what 14:26:41
2 jobs weren't important. I had a project 14:26:45
3 management background through other jobs before 14:26:48
4 Chevron. I had done more influential leadership 14:26:54
5 positions which is also necessary in GTL because 14:26:59
6 you're working with other departments and other 14:27:03
7 groups. I just had more general experience that 14:27:05
8 aligned with the selection criteria. 14:27:11
9 Q Anything else? 14:27:15
10 A No. 14:27:15
11 Q What -- so, ultimately, Chevron created 14:27:27
12 a role for you; right? 14:27:30
13 A Yes. 14:27:33
14 Q And it was the reliability change 14:27:33
15 operating assistant; correct? 14:27:36
16 A Yes. 14:27:38
17 Q Okay. And so that's an OA role; right? 14:27:38
18 A No. 14:27:41
19 Q Why not? 14:27:42
20 A All of the OA roles are in operations, 14:27:46
21 except for the two change OA positions which were 14:27:48
22 both in maintenance and were both discontinued 14:27:52
23 during the reorganization. They also only existed 14:27:54
24 for one year. OA positions has been around in the 14:27:57
25 organization by one title or another as far back 14:28:02

1 as anyone really that still works there can 14:28:09
2 remember. It's an integral position in the 14:28:13
3 day-to-day operation of the facility. So the job 14:28:18
4 duties and responsibilities are -- are very 14:28:22
5 dissimilar between an OA and a reliability change 14:28:24
6 OA or a maintenance change OA. 14:28:28
7 Q And so you felt -- well, did you feel 14:28:35
8 that this was a downgrade from your IEAR team lead 14:28:39
9 position? 14:28:52
10 A I did feel that way, yes. 14:28:52
11 Q But you were ultimately put back into 14:28:55
12 the IEAR team lead position; right? 14:28:58
13 A I was, against my wishes. But, yes, I 14:29:01
14 was. 14:29:07
15 Q Okay. Well, we'll get to that. The -- 14:29:07
16 the reliability change operating assistant role 14:29:09
17 was created at the suggestion of your supervisor, 14:29:12
18 Austin Ruppert; right? 14:29:16
19 A Yes. 14:29:16
20 Q Okay. And so would you agree that 14:29:18
21 Mr. Ruppert had a good opinion of your abilities? 14:29:20
22 A Yes. 14:29:20
23 Q And he endorsed you for the REM job in 14:29:22
24 Escravos; right? 14:29:26
25 A No. 14:29:27

1 change OA, maintenance change OA were different 14:33:53
2 from all the other OA roles -- roles at the 14:33:57
3 facility; right? 14:33:59
4 A Yes. 14:34:00
5 Q And how so? As a -- as a reliability 14:34:00
6 change OA, weren't you also in a leadership role? 14:34:03
7 A No. 14:34:03
8 Q Were you guiding teams? 14:34:12
9 A No. 14:34:12
10 Q But the other OA positions did? 14:34:17
11 A The operating assistants have day-to-day 14:34:20
12 say in the way the units at the refinery operate. 14:34:23
13 So even though they don't give direct -- even 14:34:29
14 though the people don't report to them, they give 14:34:33
15 direct instructions to operations and even 14:34:36
16 maintenance personnel about what should be done 14:34:39
17 today, what things are the priority. They 14:34:42
18 effectively run a small section of the refinery. 14:34:47
19 Q But you're saying the reliability change 14:34:52
20 OA did not do that? 14:34:54
21 A That is correct. 14:34:56
22 Q And why is that? 14:34:56
23 A It wasn't its job. 14:34:58
24 Q What was its job? 14:35:00
25 A I mean, I don't really have a job 14:35:02

1 description for it because it doesn't exist. 14:35:06

2 Q What were you doing on a day-to-day 14:35:09

3 basis? 14:35:11

4 A Whatever Austin wanted me to do. I 14:35:12

5 spent the first three or so months training the 14:35:15

6 new IEAR team lead and wrapping up some projects 14:35:19

7 that I was working on. I think I also got 14:35:26

8 assigned to an investigation, but it was just -- 14:35:31

9 it's kind of like whatever -- 14:35:34

10 Q Almost like special projects? 14:35:36

11 A Yeah. 14:35:38

12 Q Okay. Now, less than a year later 14:35:44

13 around October, 2020, that's when this big reorg 14:35:47

14 happened -- right? -- restructuring of the 14:35:49

15 business? 14:35:51

16 A That's -- that's when it rolled down to 14:35:51

17 my level, yeah. It began much earlier than that. 14:35:54

18 Q Okay. And are you aware that ten 14:35:57

19 percent of the employees were laid off? 14:35:58

20 A I am. 14:36:00

21 Q And -- 14:36:00

22 A I actually take issue with that number. 14:36:02

23 It's not ten percent were laid off. Ten percent 14:36:05

24 of the employee -- there was a reduction of ten 14:36:08

25 percent of the workforce. 14:36:10

1 Q And was that Austin Ruppert at the time? 15:48:49

2 A It was not. It was Greg Curtin. Austin 15:48:52

3 Ruppert had opted not to stay with the company 15:48:56

4 during the reorganization. 15:48:59

5 Q So you gave copies of this to Ms. Tse 15:49:01

6 and "Ms." -- Mr. Curtin; correct? 15:49:03

7 A Yes. 15:49:05

8 Q Anyone else? 15:49:05

9 A No. 15:49:07

10 Q Okay. And this is your resignation 15:49:07

11 letter; right? 15:49:09

12 A Yes. 15:49:10

13 Q And it states, among other things, you 15:49:11

14 appreciate all the opportunities you've been -- 15:49:13

15 you've given -- that Chevron has given you during 15:49:16

16 your time at Chevron Products Company and the 15:49:19

17 support you've received from the rest of the team; 15:49:20

18 right? 15:49:22

19 A Correct. 15:49:22

20 Q Okay. And so the letter doesn't say 15:49:23

21 anything about working with conditions so 15:49:25

22 intolerable that you had no choice but to quit; 15:49:28

23 correct? 15:49:28

24 A That is correct. 15:49:31

25 Q And/or that you felt like you were 15:49:31

1	forced to leave Chevron; correct?	15:49:33
2	A Correct.	15:49:35
3	Q And did you ever express those	15:49:35
4	sentiments in writing to anyone at Chevron?	15:49:36
5	A Not in writing.	15:49:39
6	Q Did you express them verbally?	15:49:40
7	A Yes.	15:49:40
8	Q To who?	15:49:43
9	A Greg Curtin, Austin Ruppert. I	15:49:45
10	expressed to them on several occasions that I felt	15:49:51
11	that my treatment at the company had been very	15:49:55
12	unfair and that I was considering leaving and --	15:49:57
13	yeah.	15:50:10
14	Q Mr. Ruppert left during the	15:50:10
15	reorganization event; right?	15:50:11
16	A Yes.	15:50:13
17	Q That was not quite a year but almost a	15:50:13
18	year before you resigned.	15:50:16
19	A Correct.	15:50:17
20	Q And so did you express this to him while	15:50:18
21	he was your supervisor or after he left?	15:50:20
22	A While he was my supervisor.	15:50:23
23	Q Anyone else?	15:50:26
24	A Nobody in a position that would have	15:50:28
25	done anything about it, no.	15:50:31

1	regard; Mr. Curtin?	15:51:28
2	A I laid out the jobs that I had applied	15:51:30
3	to and that, you know, certain things had been on	15:51:34
4	my career development path since I started at	15:51:36
5	Chevron and many people had made me many promises	15:51:39
6	and many people had said that they would do things	15:51:42
7	for me and help me out, if I did X or Y; and that	15:51:45
8	those things never came to fruition; and that I	15:51:50
9	see being placed back in the role that I was	15:51:54
10	placed in as just a continuation of that.	15:51:56
11	Q Okay. So you didn't say anything to him	15:52:00
12	about discrimination or retaliation?	15:52:02
13	A No.	15:52:10
14	Q Let me ask it a better way. Is it -- is	15:52:11
15	it true that you did not say anything to him about	15:52:14
16	discrimination or retaliation?	15:52:16
17	A That is true.	15:52:17
18	Q Okay. Did you say anything to	15:52:18
19	Mr. Ruppert about discrimination or retaliation?	15:52:19
20	A I believe I said something about	15:52:21
21	discrimination to Mr. Ruppert but not about	15:52:23
22	retaliation.	15:52:27
23	Q When did you say something about	15:52:28
24	discrimination to Mr. Ruppert?	15:52:30
25	A It would have been at the time when I	15:52:31

1 believed the discrimination occurred. 15:52:35

2 Q Is that age discrimination? 15:52:37

3 A No. That would have been disability 15:52:39

4 discrimination. 15:52:42

5 Q I see. Oh. So he was copied on that 15:52:43

6 e-mail to Mr. Powers? 15:52:45

7 A We would have to refer back to the 15:52:48

8 document as to whether he was copied or not, but I 15:52:50

9 know I told him in person. 15:52:52

10 Q So assuming he was copied on the e-mail, 15:52:55

11 you're saying you also told him in person? 15:53:00

12 A That is correct. 15:53:01

13 Q Okay. And what exactly did you say to 15:53:02

14 him in person? 15:53:04

15 A Just that I thought it was 15:53:05

16 discriminatory that they didn't have a good reason 15:53:06

17 for not letting me go to Escravos. 15:53:09

18 Q Anything else? 15:53:13

19 A I don't think so. No details. 15:53:14

20 Q Do you know whether he ever told anybody 15:53:15

21 else about that? 15:53:17

22 A I have no idea. 15:53:17

23 Q And so why didn't you say anything about 15:53:19

24 any of that in this resignation letter? 15:53:21

25 A The typical resignation letter doesn't 15:53:29

1 say anything bad about a company that you're 15:53:33
2 leaving, and I saw no benefit to writing it down 15:53:36
3 to people that really don't have anything to do -- 15:53:40
4 any power to affect what I was complaining about. 15:53:43
5 Q Did you talk to anyone else at Chevron 15:53:54
6 about your resignation? 15:53:56
7 A No. 15:53:56
8 Q And I'm not -- again, I'm not trying to 15:54:01
9 surprise. 15:54:03
10 Did you talk to Troy Tortorich? 15:54:04
11 A I don't believe I did, no. 15:54:06
12 MR. MUSSIG: I'll mark as Exhibit 18 a 15:54:19
13 document titled "voluntarily termination - 15:54:21
14 GO-439-1," Bates-numbered SNOOKAL-1143. 15:54:26
15 (Exhibit 18 was marked for 15:54:26
16 identification by the Certified 15:54:26
17 Shorthand Reporter.) 15:54:37
18 MS. LEAL: Thank you. 15:54:37
19 BY MR. MUSSIG: 15:54:38
20 Q Are you familiar with this document? 15:54:39
21 A I am. 15:54:41
22 Q Is it -- is that your signature in the 15:54:43
23 middle of the page? 15:54:44
24 A It is. 15:54:45
25 Q And you signed this on August 4, 2021? 15:54:47

1	A	I did.	15:54:49
2	Q	And this says:	15:54:51
3		"I wish to resign my	15:54:52
4		employment with the Chevron	15:54:53
5		Products Company effective	15:54:55
6		August 20, 2021, for the following	15:54:56
7		reasons: I am leaving for an	15:54:59
8		opportunity with significantly	15:55:01
9		increased responsibility."	15:55:02
10		There's no other stated reason for your	15:55:04
11		resignation; correct?	15:55:07
12	A	Correct.	15:55:08
13	Q	Is that true? You were leaving for an	15:55:08
14		opportunity with a significantly increased	15:55:10
15		responsibility?	15:55:12
16	A	It is a correct statement. Yeah.	15:55:13
17	Q	Did you discuss with anyone at Chevron	15:55:17
18		in this time period about anything with regard to	15:55:22
19		discrimination or retaliation?	15:55:27
20	MS. LEAL:	Again, that he hasn't already	15:55:29
21		discussed today, I assume.	15:55:30
22	BY MR. MUSSIG:		15:55:30
23	Q	During -- during this -- during the	15:55:34
24		resignation --	15:55:36
25	MS. LEAL:	Okay.	15:55:37

1 BY MR. MUSSIG: 15:55:37

2 Q -- in connection with the resignation? 15:55:37

3 A No. 15:55:39

4 Q And, again, why not? 15:55:45

5 A The same answer. There's no point in 15:55:49

6 putting it on this form which is just going to get 15:55:52

7 stuck in my file. They probably didn't even read 15:55:55

8 it. 15:55:58

9 MR. MUSSIG: 19. I'm going to mark as 15:56:14

10 Exhibit 19 a document entitled "exit interview." 15:56:16

11 (Exhibit 19 was marked for 15:56:16

12 identification by the Certified 15:56:16

13 Shorthand Reporter.) 15:56:16

14 BY MR. MUSSIG: 15:56:16

15 Q And you participated in an exit 15:56:36

16 interview with Ms. Tse before you left Chevron; 15:56:38

17 correct? 15:56:38

18 A I did. 15:56:42

19 Q And the interview was voluntary; 15:56:43

20 correct? 15:56:43

21 A Yes. 15:56:45

22 Q Do you know -- you might not know the 15:56:48

23 answer to this. 15:56:51

24 Do you know whether Chevron only 15:56:51

25 requests this type of exit interview when 15:56:52

1	Q	Did you at some point say that you	16:12:29
2		needed to leave Chevron for your mental health?	16:12:31
3	A	I did not; not to anyone at Chevron, no.	16:12:33
4	Q	Do you feel like you did need to leave	16:12:38
5		Chevron for your mental health?	16:12:40
6	A	Yes.	16:12:42
7	Q	Why so?	16:12:43
8	A	As someone that doesn't have a degree,	16:12:50
9		it's very difficult to make a career above a	16:12:53
10		technician level; right?	16:12:56
11		To get into engineering, to get into	16:12:57
12		management and leadership, to get into a	16:13:00
13		multinational oil corporation, all of these things	16:13:04
14		are not without a lot of head wind, if you don't	16:13:07
15		have a Bachelor's degree and not just a Bachelor's	16:13:10
16		degree but in a specific field; right?	16:13:15
17		They want an engineering degree almost	16:13:16
18		exclusively.	16:13:25
19		I have always worked very hard to add as	16:13:26
20		much value in whatever role I have at whatever	16:13:30
21		company I'm at, and I take a lot of personal	16:13:33
22		responsibility for my work ethic and the	16:13:36
23		contributions that I make, and I have always seen	16:13:39
24		that rewarded in one way or another by the	16:13:46
25		companies I worked for.	16:13:48

1 It was always a small struggle at 16:13:55
2 Chevron to make progress, and I attributed that to 16:13:57
3 the size of the company. It is the largest 16:14:00
4 company that I had worked for. 16:14:03
5 But as time went on, especially after 16:14:07
6 the Nigeria -- or after the -- the EGTL, you know, 16:14:09
7 revocation, the -- the subsequent inability to be 16:14:20
8 placed into roles that I felt at least 16:14:26
9 competitive, if not overqualified in some cases, 16:14:32
10 certainly to the candidates that were selected -- 16:14:35
11 I felt like I wasn't being rewarded for my 16:14:39
12 contributions and that, you know, it -- it caused 16:14:41
13 me a lot of -- I don't know -- a lot of grief 16:14:45
14 and -- and -- and difficulty in -- in figuring out 16:14:56
15 what I was; right? 16:15:04
16 So it's like -- it's like -- almost like 16:15:05
17 it kind of twisted my identity a little bit; 16:15:08
18 right? 16:15:12
19 Like if I'm this person that works hard 16:15:12
20 and makes it anyway, even though I don't have all 16:15:15
21 the tools that I should have, I can make it work, 16:15:17
22 and then all of a sudden I can't make it work and 16:15:20
23 just it keeps happening and keeps happening and 16:15:23
24 keeps happening, it got to the point where, you 16:15:26
25 know, I started suffering from depression. And -- 16:15:31

1 and so I did seek a therapist and then counseling, 16:15:34
2 and they, you know, through -- through 16:15:42
3 conversations, basically, that's how we identified 16:15:45
4 that a lot of my personality and my self-worth is 16:15:48
5 tied up in my job and advancement and -- and, you 16:15:51
6 know, rewards that I get from that, and it was 16:15:59
7 really almost my whole world at that point. 16:16:02
8 And so, you know, she encouraged me to 16:16:10
9 try to separate that out some -- right? -- so 16:16:14
10 that's part of what my therapist and I worked on, 16:16:17
11 getting side hobbies and doing other things. But, 16:16:21
12 you know, it never really fully separated from 16:16:24
13 work. 16:16:27
14 And then once the reorganization 16:16:28
15 happened and I wasn't -- I didn't get any of the 16:16:31
16 jobs that I put in for and they basically said, 16:16:41
17 "Take this old job you already had or quit," which 16:16:44
18 is similar to something that they did to me in 16:16:48
19 2013 when I left the analyzer role and they're 16:16:52
20 like, "We need you in technical, so take this 16:16:55
21 technical job. You're not going to be in 16:16:58
22 maintenance anymore." It's just like -- it was 16:17:01
23 just like repeating. And that's when my therapist 16:17:06
24 started suggesting that I should probably try to, 16:17:08
25 you know, maybe look for other work. 16:17:10

1	Q	Well, let me ask: So when did you begin	16:17:13
2		seeing a therapist?	16:17:18
3	A	I believe it was sometime in 2020.	16:17:21
4	Q	During COVID?	16:17:25
5	A	It was during COVID, yes.	16:17:26
6	Q	And who is the therapist?	16:17:29
7	A	It -- I talked to a few people before	16:17:30
8		finally we settled on one therapist. It was	16:17:34
9		Eileen Baer, I believe her name was.	16:17:37
10	Q	How do spell Baer? "B-e-a-r"?	16:17:40
11	A	I'm not sure how you -- no. It's	16:17:43
12		like --	16:17:47
13	Q	Bayer aspirin --	16:17:47
14	A	Maybe, yeah.	16:17:48
15	Q	-- B-a-y-e-r?	16:17:49
16	A	I -- I think it was "B-e-a" -- or	16:17:50
17		B-a-e-r; something like that. It wasn't -- it --	16:17:55
18		it's in the --	16:17:57
19	Q	All right.	16:17:58
20	A	It's in the records.	16:17:59
21	Q	Are you still seeing her?	16:18:02
22	A	No.	16:18:03
23	Q	When did you stop seeing her?	16:18:05
24	A	Shortly after I resigned from Chevron.	16:18:07
25	Q	Why did you stop seeing her?	16:18:09

1 A Most of what we were talking about 16:18:12
2 was -- at that point, anyway, it was Chevron 16:18:14
3 and -- and being -- you know, ways to cope with 16:18:21
4 continued disappointment that was happening at 16:18:23
5 Chevron. I wasn't really discussing other issues 16:18:26
6 that I was having with her. 16:18:32

7 You know, the -- when I didn't go to 16:18:36
8 Escravos, it caused a lot of difficulty in my 16:18:44
9 family with my wife and my son, but it wasn't -- 16:18:46
10 it wasn't the kind of thing that I needed therapy 16:18:55
11 for; right? 16:19:02

12 My wife was upset. My son was upset. 16:19:03
13 We had him in a special school for some 16:19:06
14 developmental disabilities that he has and for 16:19:12
15 some mental health disabilities that he has, and 16:19:14
16 we weren't going to be able to send him to that 16:19:21
17 school anymore without the money from Nigeria. 16:19:24

18 But I didn't need the therapist to help 16:19:31
19 me talk to my son and my wife about that; right? 16:19:33

20 We had communication, and we were 16:19:37
21 working through that on our own. 16:19:39

22 She was really helping me with the 16:19:40
23 continued negative feelings that I was having just 16:19:47
24 by working for Chevron; right? 16:19:52

25 Q Because you weren't being promoted? 16:19:54

1 A Right, and watching other people be 16:19:56
2 promoted and essentially, in my mind, being 16:19:58
3 demoted and then not being particularly valued for 16:20:01
4 the work that I was doing even in the new position 16:20:04
5 that I was in. It wasn't new. In the position 16:20:07
6 that I was put back in. They held a -- an 16:20:13
7 employee, you know, like survey, engagement 16:20:22
8 survey, and there were a lot of feedback and a lot 16:20:25
9 of stuff, and Chevron wasn't really going to 16:20:27
10 address that. 16:20:30

11 And I -- I felt like, you know, that 16:20:31
12 made it difficult for me in that, you know, my 16:20:34
13 group had had a hard time through COVID and they 16:20:37
14 had had a hard time through the reorganization, 16:20:42
15 and it -- it didn't seem like Chevron was going to 16:20:45
16 help them any more than me. And so it just, you 16:20:48
17 know, was almost a daily -- daily thoughts about 16:20:53
18 how -- how much it wasn't that great to work there 16:21:00
19 anymore. 16:21:02

20 Q Did you see any other mental health 16:21:02
21 providers or -- 16:21:05

22 A I also took Cymbalta at the time, so I 16:21:07
23 had a psychiatrist just for prescribing. 16:21:12

24 Q And who was that? 16:21:19

25 A I don't re -- I don't recall her name. 16:21:19

1 STATE OF CALIFORNIA)
) SS.
2 COUNTY OF VENTURA)

3 I, John M. Taxter, a California Certified
4 Shorthand Reporter, Certificate No. 3579, a
5 Registered Professional Reporter, do hereby
6 certify:

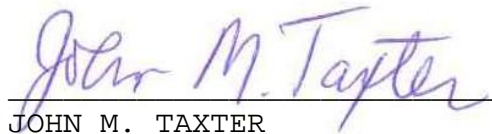
7 That the foregoing proceedings were taken
8 before me at the time and place therein set forth,
9 at which time the deponent was put under oath by
10 me; that the testimony of the deponent and all
11 objections made at the time of the examination
12 were recorded stenographically by me and were
13 thereafter transcribed; that the foregoing is a
14 true and correct transcript of my shorthand notes
15 so taken.

16 I further certify that I am neither counsel
17 for nor related to any party to said action.

18 The dismantling, unsealing, or unbinding of
19 the original transcript will render the Reporter's
20 Certificate null and void.

21 Pursuant to Federal Rule 30(e), transcript
22 review was requested.

23 Dated May 22, 2024.

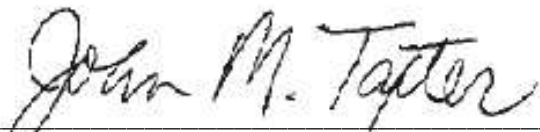
24 
25 JOHN M. TAXTER
California Certified Shorthand
Reporter No. 3579, RPR

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I, John M. Taxter, Certified Shorthand Reporter,
CSR No. 3579, hereby certify:

The foregoing is a true and correct copy of the
original transcript of the proceedings taken by me
as thereon stated.

Dated: May 23, 2024



John Taxter, CSR No. 3579